

EXHIBIT A

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - ReturnSTATE OF MICHIGAN
JUDICIAL DISTRICT
7th JUDICIAL CIRCUIT
COUNTY PROBATE

SUMMONS AND COMPLAINT

CASE NO.

72-98689

NI

RICHARD B. YUILLE
P-22664

Court telephone no.

(810) 257-3220

Court address

900 S. Saginaw Street, Flint, MI 48502

Plaintiff's name(s), address(es), and telephone no(s).

RUBY L. CRAWFORD

v

Defendant's name(s), address(es), and telephone no(s).

WAL-MART STORES EAST, LP.

Plaintiff's attorney, bar no., address, and telephone no.

Edwin W. Jakeway P-15424)
Jakeway, Jakeway & Jakeway, P.C.
G-8161 S. Saginaw Street
Grand Blanc, MI 48439
810.694.1211

Resident Agent:

Wal-mart Stores East, LP
The Corporation Company
30600 Telegraph Road
Bingham Farms, MI 48025**SUMMONS** NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state). (MCR 2.111(C))
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.

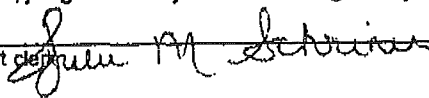
Issued

AUG - 1 2012

This summons expires

OCT 30 2012

Court clerk



*This summons is invalid unless served on or before its expiration date.

This document must be sealed by the seal of the court.

COMPLAINT Instruction: The following is information that is required to be in the caption of every complaint and is to be completed by the plaintiff. Actual allegations and the claim for relief must be stated on additional complaint pages and attached to this form.

Family Division Cases

- ☐ There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.
- ☐ An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in _____ Court.
- The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.

Judge

Bar no.

General Civil Cases

- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in _____ Court.
- The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.

Judge

Bar no.

VENUE

Plaintiff(s) residence (include city, township, or village)

Genesee County, MI

Defendant(s) residence (include city, township, or village)

Genesee County, MI

Place where action arose or business conducted

Genesee County, MI

07/26/2012

Date

Signature of attorney/plaintiff

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

PROOF OF SERVICE**SUMMONS AND COMPLAINT**
Case No. 12- 3

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE☐ **OFFICER CERTIFICATE**

OR

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult who is not a party or an officer of a corporate party, and that: (notarization required)

- ☐ I served personally a copy of the summons and complaint,
☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint,
 together with _____

List all documents served with the Summons and Complaint

_____ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

- ☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare that the statements above are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Mileage fee	Total fee
\$		\$	\$

Signature _____

Name (type or print) _____

Title _____

Subscribed and sworn to before me on _____ Date _____ County, Michigan.

My commission expires: _____ Date _____ Signature: _____

Deputy court clerk/Notary public

Notary public, State of Michigan, County of _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with _____ Attachments
 _____ on _____

Day, date, time

on behalf of _____

Signature _____

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF GENESEE

RUBY L. CRAWFORD,

Plaintiffs,

v

WAL-MART STORES EAST, LP,

Defendant.

Case No. 12-98689 NO
RICHARD B. YUILLE
P-22664

EDWIN W. JAKEWAY (P-15424)
Jakeway, Jakeway & Jakeway, P.C.
G-8161 S. Saginaw Street
Grand Blanc, MI 48439
810.694.1211

A TRUE COPY
Michael J. Carr, Clerk

PLAINTIFF'S COMPLAINT

NOW COMES Plaintiff, by and through her attorneys, Jakeway, Jakeway & Jakeway, P.C., and for her complaint states as follows:

1. That Plaintiff, Ruby L. Crawford, is a resident of Genesee County Michigan; that Defendant is a corporation licensed to conduct business in Genesee County, Michigan and the accident complaint of occurred in Genesee County, Michigan.
2. That on or about November 6, 2010, Plaintiff, Ruby L. Crawford, was a customer and a business invitee at Defendant, Wal-Mart Stores East, LP located on Corunna Road in Flint, Michigan.
3. That the Defendant, its agents, servants and employees owed a duty to Plaintiff and others on their premises not to cause injuries to customers, and Plaintiff, by the operation of manual trucks and carrying carts
4. That Defendant breached the duties owed to Plaintiff when its employee, Megan Hampton, in the scope of her employment, negligently struck Plaintiff with a large two level cart as Plaintiff was standing in front of a display.

JAKEWAY, JAKEWAY
& JAKEWAY, P.C.
ATTORNEYS AT LAW

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5. That Defendant Wal-Mart Stores East, L.P. its agents, servants and employees are responsible for the acts of its employees committed during the course and scope of their employment.

6. That Defendant, its agent, servant and employee operated the large commercial truck or cart negligently and was grossly negligent by not making proper observation of Plaintiff, operating the cart at a speed and without regard to the presence of Plaintiff and striking Plaintiff in the back, hip, pelvis and waist, forcing her knee into her shopping cart.

7. That as a proximate cause of Defendant's negligence and gross negligence, Plaintiff sustained injuries including, but not limited to, injuries to her back with radiating pain and numbness into her legs, pelvis, hip, wrist and knee.

8. That Plaintiff fears she may need surgery due to the injuries caused in the accident.

9. That the Plaintiff has a condition known as Paget's Disease which did not effect her before the injury sustained and Plaintiff fears that the condition may have made her more susceptible to injury and/or caused worsening or aggravation of the condition.

10. That Plaintiff is fearful that the injuries will result in traumatic arthritis and aggravation of a pre-existing arthritic condition.

11. That Plaintiff, Ruby Crawford, is unable to do many of the things she enjoyed doing before the time of the accident and now uses a cane on a regular basis.

12. That Plaintiff has become obligated for medical expenses in the past and reasonably believes she will become obligated for medical expenses in the future and has lost earnings and earning capacity all due to the negligence of Defendant and the injuries sustained.

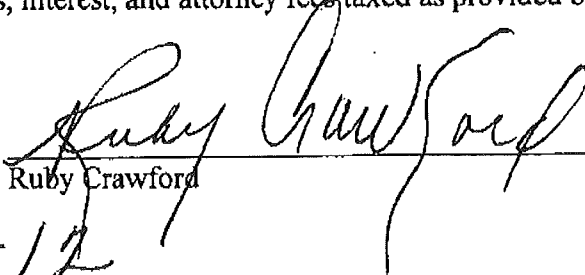
13. That the amount in controversy exceeds the sum of Twenty Five Thousand Dollars (\$25,000) and the jurisdiction of the District Court.

WHEREFORE, Plaintiffs pray for judgment in whatever amount they shall be found to be entitled plus costs, interest, and attorney fees taxed as provided by statute.

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& JAKEWAY, P.C.
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Ruby Crawford

DATED: 7-26-12

Jakeway, Jakeway & Jakeway, P.C.

DATED: *July 26, 2012* By 
Edwin W. Jakeway

JAKEWAY, JAKEWAY
& JAKEWAY, P.C.
ATTORNEYS AT LAW

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